

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**1) AGAPITO JORGE VENTURA  
AKAs: JORGE VENTURA, GEORGE  
VENTURA, EL RAITERO**

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**CR. NO. 5:24-CR-1187-01-S**

**JOINT MOTION FOR NEW SCHEDULING ORDER AND  
CONTINUANCE OF FINAL PRETRIAL CONFERENCE**

COMES NOW the United States of America, by and through Nicholas J. Ganjei, United States Attorney for the Southern District of Texas, and the undersigned Assistant United States Attorney, and files this joint motion requesting a new scheduling order and a continuance of the Final Pretrial Conference for Defendant Agapito Jorge Ventura, which is currently set on August 7, 2025. (Dkt. No. 44.) As grounds, the Government states as follows:

- 1) This case involves a multi-defendant international human smuggling conspiracy, involving a mass casualty event that occurred in Chiapas, Mexico. The case has been declared complex.
- 2) On December 31, 2024, the Federal Public Defender's Office was appointed to represent Agapito Jorge Ventura (Defendant 1).
- 3) At that time, the attorneys of record discussed the volume of discovery to be produced, and jointly requested the Court set a scheduling order.
- 4) On January 2, 2025, the Court issued a scheduling order for Defendant Ventura, and set the Final Pretrial Conference for August 7, 2025. (Dkt. No. 44). The Government began producing discovery to the Federal Public Defender's Office in accordance with that scheduling order.

- 5) On May 12, 2025, the Court terminated the Federal Public Defenders' Office and appointed new counsel, Oscar Vela, to represent Ventura.
- 6) On May 15, 2025, Ventura's Co-Defendant, Alberto Macario Chitic (Defendant 3), had his initial appearance in this same case number after being brought from Guatemala. Counsel was appointed for Chitic.
- 7) On May 21, 2025, the Court ordered the following deadlines for Alberto Macario Chitic: Discovery due by 12/22/2025. Dispositive Motion Filing due by 1/5/2026. Government Response due by 1/12/2026. Final Pretrial Conference set for 2/3/2026 at 01:30 PM in Courtroom 3C before Magistrate Judge Christopher dos Santos. (Dkt. No. 69).
- 8) The undersigned Assistant U.S. Attorney has since spoken with Oscar Vela, the newly appointed attorney for Mr. Ventura.
- 9) Both parties jointly request that the Court modify the scheduling order for Mr. Ventura to mirror the scheduling order imposed for Mr. Chitic and to set the Final Pretrial Conference for Mr. Ventura on February 3, 2026.
- 10) This would allow defense counsel for both Ventura and Chitic (who were appointed the same week) adequate time to receive and review the discovery and to prepare the case.
- 11) There are no material witnesses being held in custody on this matter.

WHEREFORE, the United States of America respectfully requests this Honorable Court grant this joint motion.

Respectfully submitted,

Nicholas J. Ganjei  
United States Attorney

By: /s/ Jennifer L. Day  
Jennifer L. Day  
Assistant United States Attorney

**CERTIFICATE OF CONFERENCE AND SERVICE**

I hereby certify that, on June 2, 2025, this motion was electronically filed with the Clerk of Court using the CM/ECF System which will transmit notification of such filing to all Counsel of Record. I hereby also certify that Oscar Vela, attorney for Agapito Jorge Ventura, was contacted about the filing of this motion and that he joins in the request for a new scheduling order.

By: /s/ Jennifer L. Day  
Jennifer L. Day  
Assistant United States Attorney